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Attorneys for Andrea Klein



Order Filed on May 29, 2025
by Clerk
U.S. Bankruptcy Court
District of New Jersey

In re:

ERIC PAUL KLEIN,

Debtor.

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

Case No. 23-19344

Chapter 7

**CONSENT ORDER BETWEEN THE TRUSTEE AND ANDREA KLEIN GRANTING
RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362 TO
PROCEED WITH AN ACTION IN THE CHANCERY DIVISION: FAMILY PART**

The relief set forth on the following pages numbered two (2) through three (3) is hereby
ORDERED.

DATED: May 29, 2025

A handwritten signature in black ink, appearing to read "Mark E. Hall".

Honorable Mark E. Hall
United States Bankruptcy Judge

Page 2 of 3

Debtor: Eric Paul Klein

Case No.: 23-19344

Caption: Consent Order Between the Trustee and Andrea Klein Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 to Proceed with an Action in the Chancery Division: Family Part

THIS MATTER having been brought before the Court by Andrea Klein ("Klein"), by and through her attorneys Mellinger Kartzman LLC, on application in lieu of motion pursuant to FED. R. BANKR. P. 9019 and D.N.J. LBR 9019-4(b) for a Consent Order Between Jeffrey Testa (the "Trustee") and Andrea Klein Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 to Proceed with an Action in the Chancery Division: Family Part (the "Consent Order"); and Klein and the Trustee having amicably resolved the issues on the terms set forth herein, as appears from the signatures of counsel affixed hereto, it is hereby

ORDERED AS FOLLOWS:

1. Klein is granted immediate relief from the automatic stay arising from this bankruptcy case to allow the divorce action between Klein and the Debtor to proceed with respect to all matters, which matters may include:

- a. The granting of a divorce to the parties;
- b. Child custody and parenting time;
- c. Equitable distribution;
- d. The adjudication of all claims to alimony, maintenance, and support; and
- e. All such other relief in law or equity as the court may deem just and proper in order to grant complete relief to the Debtor and/or Klein and their minor children, except as set forth in Paragraph 2 herein.

2. Relief from the automatic stay is not granted by this Order to permit the enforcement, collection, or satisfaction (including, without limitation, levy or garnishment) of any of the Debtor's obligations from any assets of the Debtor's Chapter 7 bankruptcy estate.

3. The requirements imposed by FED. R. BANKR. P. 4001(a)(3) and D.N.J. LBR 4001-1 and 4001-4 are and shall be waived. Thus, relief from the automatic stay is effective immediately upon entry of the Order.

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Debtor: Eric Paul Klein

Case No.: 23-19344

Caption: Consent Order Between the Trustee and Andrea Klein Granting Relief from the Automatic Stay
Pursuant to 11 U.S.C. § 362 to Proceed with an Action in the Chancery Division: Family Part

4. A copy of this Order shall be served on all interested parties within five (5) days

from the date of entry.

***The undersigned hereby consent to the
form and entry of the within Order:***

MELLINGER KARTZMAN LLC

*Attorneys for Andrea Klein (Bankruptcy
Counsel)*

By: 
STEVEN A. JAYSON, ESQ.

Dated: ~~March~~, 2025


May 9, 2025

GENOVA BURNS LLC

Attorneys for Jeffrey Testa, Chapter 7 Trustee

By: 
SCOTT S. REVER, ESQ.

Dated: ~~March~~, 2025

Minnin and Sherman

Scott D. Sherman
5/28/2025

In re:
Eric Paul Klein
Debtor

Case No. 23-19344-MEH
Chapter 7

CERTIFICATE OF NOTICE

District/off: 0312-2
Date Rcvd: May 29, 2025

User: admin
Form ID: pdf903

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 31, 2025:

Recip ID	Recipient Name and Address
db	+ Eric Paul Klein, 1512 N. Montezuma Heights Rd, Camp Verde, AZ 86322-7498

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 31, 2025

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 29, 2025 at the address(es) listed below:

Name	Email Address
Andrew L. Spivack	on behalf of Creditor Lakeview Loan Servicing LLC andrew.spivack@brockandscott.com, wbecf@brockandscott.com
Denise E. Carlon	on behalf of Creditor PNC BANK NATIONAL ASSOCIATION dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Gavin Stewart	on behalf of Creditor Toyota Motor Credit Corporation bk@stewartlegalgroup.com
Jeffrey Thomas Testa	jtesta@mccarter.com J118@ecfbis.com,lrestivo@mccarter.com,agreen@mccarter.com
Jeffrey Thomas Testa	on behalf of Trustee Jeffrey Thomas Testa jtesta@mccarter.com J118@ecfbis.com,lrestivo@mccarter.com,agreen@mccarter.com
Judah B Loewenstein	on behalf of Creditor Andrea Klein jloewenstein@msklaw.net sjayson@msklaw.net;pmasiello@msklaw.net;donnaz@msklaw.net

District/off: 0312-2

User: admin

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Date Rcvd: May 29, 2025

Form ID: pdf903

Total Noticed: 1

Scott D. Sherman

on behalf of Debtor Eric Paul Klein ssherman@minionsherman.com

Scott S. Rever

on behalf of Trustee Jeffrey Thomas Testa srever@genovaburns.com
srever@ecf.inforuptcy.com;dmendez@genovaburns.com;dmendez@ecf.inforuptcy.com

Steven A. Jayson

on behalf of Creditor Andrea Klein sjayson@msklaw.net jloewenstein@msklaw.net;donnaz@msklaw.net;pmasiello@msklaw.net

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 10